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9
10 **UNITED STATES DISTRICT COURT**
11 **NORTHERN MARIANA ISLANDS**

12 **UNITED STATES OF AMERICA,**
13 **Plaintiff,**

14 **Criminal Case No. 08-00020.**

15 **v.**

16 **TIMOTHY P. VILLAGOMEZ, ANTHONY**
17 **C. GUERRERO, JOAQUINA V. SANTOS**
18 **AND JAMES A. SANTOS,**

19 **Defendant.**

20
21 **MOTION TO EXTEND MOTION**
22 **DEADLINE**

23
24 **MOTION**

25 COME NOW, Defendant James A. Santos through counsel Victorino DLG. Torres from
26 the Torres Brothers, LLC. and hereby requests this Court for an extension on the motion deadline
27 to **September 22, 2008** for the following reasons:

28 1. This Motion is unopposed by the Plaintiff. *See, Declaration of Victorino DLG.*
29 *Torres.*
30 2. That the Pre-trial Motion deadline is August 25, 2008.
31 3. That undersigned counsel was newly retained to represent Mr. James A. Santos
32 and has recently substituted Mr. Colin Thompson.
33 4. That on or about August 21, 2008, undersigned counsel spoke with U.S. Assistant
34 Attorney General Mr. Eric O'Malley and requested for an extension; Mr.
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1 O'Malley agreed with an extension. *See, Declaration of Victorino DLG. Torres.*

2 5. Than on August 26, 2008, undersign counsel again spoke with Mr. O'Malley and
3 requested for an extension to **September 22, 2008**; Mr. O'Malley agreed with the
4 extension. *See, Declaration of Victorino DLG. Torres.*

5 6. That in light on the numerous witnesses and voluminous documents and newly
6 retained counsel, this request for extension is needed to properly defend Mr.
7 Santos.

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9 Respectfully submitted this 26th day of August, 2008.

10 TORRES BROTHERS, LLC.

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12 /s/
13 VICTORINO DLG. TORRES, Attorney for Mr.
14 James A. Santos

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